

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Alberta D. Mack-Lee Case No. 19 B 13688 Chapter 13

All Cases: Moving Creditor Kia Motors Finance Company Date Case Filed 5/13/19

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 8/7/19

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
 - a. ☐ Home
 - b. ☒ Car Year, Make, and Model 2019 Kia Sportage
 - c. ☐ Other (describe) _____
2. Balance Owed as of Petition Date \$ 45,990.29 as of 9/25/19
Total of all other Liens against Collateral \$ _____
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 34,600.00
5. Default
 - a. ☒ Pre-Petition Default
Number of months .7 Amount \$ 550.40
 - b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
Number of months 4 Amount \$ 3,124.16 w/ next due 10/1
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. ☒ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☒ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: 10/1/19 /s/ Cari A. Kauffman
Counsel for Movant